

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

		X
ROYAL PARK INVESTMENTS SA/NV,	:	Civil Action No. 1:14-cv-04394-AJN-BCM
Individually and on Behalf of All Others	:	
Similarly Situated,	:	<u>CLASS ACTION</u>
	:	
Plaintiff,	:	PLAINTIFF ROYAL PARK INVESTMENTS
	:	SA/NV'S NOTICE OF MOTION AND
vs.	:	MOTION FOR CLASS CERTIFICATION
	:	AND APPOINTMENT OF CLASS
DEUTSCHE BANK NATIONAL TRUST	:	REPRESENTATIVE AND CLASS
COMPANY, as Trustee,	:	COUNSEL
	:	
Defendant.	:	
	:	
	X	

PLEASE TAKE NOTICE that, plaintiff Royal Park Investments SA/NV (“Royal Park”) hereby moves the Court for an order certifying this matter as a class action pursuant to Federal Rule of Civil Procedure 23(a) and (b)(3), appointing Royal Park as Class Representative and Robbins Geller Rudman & Dowd LLP as Class Counsel. This motion is supported by the memorandum of law and the Declaration of Lucas F. Olts and exhibits thereto, concurrently filed herewith, all pleadings and papers filed herein, arguments of counsel and any other matters properly before the Court.<sup>1</sup> Oral argument is requested.

DATED: May 26, 2016

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JEFFREY J. STEIN

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s/ LUCAS F. OLTS  
LUCAS F. OLTS

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<sup>1</sup> The memorandum of law and the Declaration of Lucas F. Olts and exhibits thereto describe certain testimony designated as “Highly Confidential” by Defendant Deutsche Bank National Trust Company. Therefore, pursuant to the Court’s Individual Practices in Civil Cases, such documents are being submitted to chambers, and if the Court approves the redactions, Plaintiff will file the redacted version of the documents on ECF.

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CERTIFICATE OF SERVICE

I hereby certify that on May 26, 2016, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on May 26, 2016.

s/ LUCAS F. OLTS

LUCAS F. OLTS

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